REMARKS

Reconsideration and allowance of the above-referenced application are respectfully requested.

Claims 1-3 and 19 stand rejected under 35 USC 102(a) allegedly being anticipated by Leddy et al. However, this contention is respectfully traversed, and it is respectfully suggested that the rejection does not meet the patent office's burden of providing a prima facie showing of patentability.

Leddy et al. teaches an array of digitally controllable mirror devices, the so-called DMD or DLP device. Any element in the array can be changed, and the change of this element changes the position where the light beam is reflected. However, while each pixel is controllable to one of two directions, the light beam as a whole is always projected to the same place. This is apparent from Leddy et al. showing this system being used for TV. The display that goes to the TV always needs to go to the same location: to the TV. If the display moved positions every time a controlling bit was changed, then the TV screen would have to continually be moved.

Moreover, when you consider one single element of the array, it is in fact controllable by a digital bit to send its light output either to one location or another location.

However, claim 1 requires multiple digital bits (and this has been made more explicit in claim 1), so that each change of each single digital bit changes an output position of the output optical beam -- but only for that one bit. This is not possible in Leddy et al., since the output beam always needs to be in the same location or else television would not work. Again, when considering a single mirror pixel of the pixel array, the bit that is controlling that mirror does in fact control the beam to be located to one location or another location, but does not control each change of each single digital bit to change output position of the output optical beam, as claimed.

Therefore, claim 1 should be allowable for these reasons. There is absolutely no way to use Leddy et al. to control the reflector elements using multiple digital bits such that each change of each single bit changes an output position of the output optical beam. Any attempt to do that would destroy the intended purpose of Leddy et al., and hence would be an improper modification.

Claim 19 should be allowable for similar reasons. Claim 19 specifies a controller operating based on a plurality of digital bits which operate to change a position of the array of reflector elements to produce an output beam at a position based on the digital bits. Again, the DMD device cannot do this. Each single pixel device may have one of two positions of

pointing. However, the array as a whole always has to send its information to the same position regardless of the values of the controlling bit. Anything different would destroy the intended operation of the system.

Claims 5, 26 and 28 stand rejected over Leddy et al. in view of Lin et al. However, this contention is respectfully traversed. To the extent these claims depend from the claims noted above, it is respectfully suggested that these claims should be allowable for similar reasons.

Lin et al. admittedly teaches different sizes for reflector elements. However, there is no way that one having ordinary skill in the art would be able to modify the DMD of Leddy et al. in this way. This effective modification is based on hindsight, not on the teaching of the present specification.

Claims 26 and 28 should be allowable for similar reasons. Leddy et al. and Lin et al. are very different kinds of systems. There is no way that one having ordinary skill in the art would be able to change the size of the mirrors in the DMD. Moreover,

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Lin et al. does not teach how one could change the amount by which the mirrors are moved in the Leddy et al. DMD.

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Respectfully submitted,

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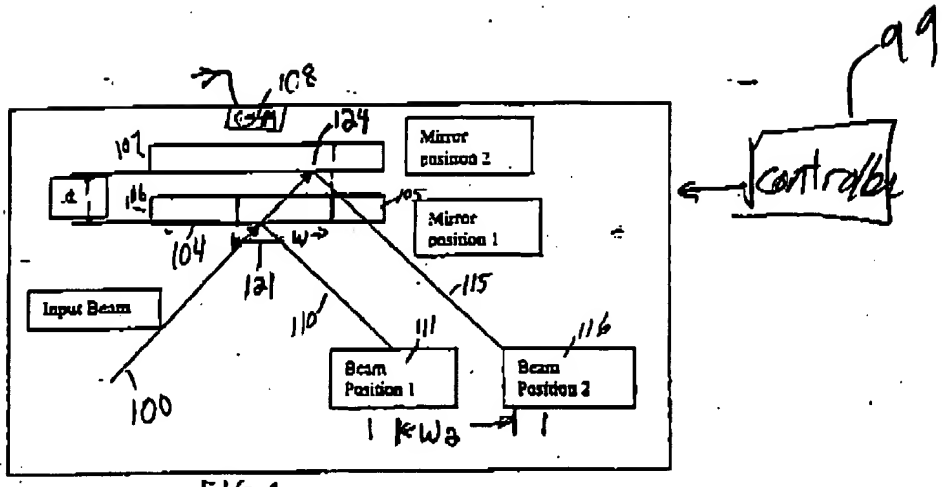

FIG. 1